

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

Hon. Robert Kugler

Civil No. 1:19-md-2875-RBK-JS

This Document Relates to:

All Actions

DECLARATION OF MARLENE J. GOLDBERG

I, Marlene J. Goldenberg, of full age, hereby declare as follows:

1. I am an attorney of the State of Minnesota, a member of good standing of the bar of this Court, and am employed with the law firm GoldenbergLaw, PLLC, counsel to Plaintiffs.
2. I make this Declaration on behalf of Plaintiffs in support of their Response in Opposition to Aurobindo Pharma Ltd.'s Motion for Protective Order to preclude the deposition of its Chief Quality Officer Dr. A Ram Mohan Rao and the production of his custodial file.
3. A true and correct copy of Auro-MDL 2875-0107164 is attached as Exhibit A.
4. A true and correct copy of Auro-MDL 2875-0080757 is attached as Exhibit B.
5. A true and correct copy of Auro-MDL 2875-0100584 is attached as Exhibit C.
6. A true and correct copy of Auro-MDL 2875-0087828 is attached as Exhibit D.
7. A true and correct copy of Auro-MDL 2875-0107754 is attached as Exhibit E.
8. A true and correct copy of Auro-MDL 2875-0107477 is attached as Exhibit F.
9. A true and correct copy of APL-MDL 2875-0094925 is attached as Exhibit G.

10. A true and correct copy of APL-MDL 2875-0148638 is attached as Exhibit H.
11. A true and correct copy of APL-MDL 2875-0103466 is attached as Exhibit I.
12. A true and correct copy of APL-MDL 2875-0081660 is attached as Exhibit J.
13. A true and correct copy of APL-MDL 2875-0037862 is attached as Exhibit K.
14. A true and correct copy of Auro-MDL 2875-0021295 is attached as Exhibit L.

I, Marlene J. Goldenberg, declare under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2021.

/s/ Marlene J. Goldenberg
Marlene J. Goldenberg, Esq.